



LAW OFFICE OF WARREN R. GRAHAM, ESQ.

February 7, 2020

Via ECF Filing

Hon. Michael E. Wiles
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, NY 10004

Re: Congregation Achpretvia Tal Chaim SharHayushor, Inc.
Chapter 11 Case No. 16-10092-mew
Claim of Jpre Building Services, Inc.

Honorable Sir:

As this Court is aware, this office represents Jpre Building Services, Inc., ("Jpre"), an administrative claimant in the above-referenced matter, with a pending objection to the motion (the Motion") of the above-named debtor (the "Debtor") for approval of a credit bid sale to its secured creditor, SF V 69th Street, LLC, the purported DIP lender (the "DIP Lender"), reported as the highest and best bid for certain assets of the Debtor, received at that certain auction (the "Auction") held on January 27, 2020, at the offices of Loeb & Loeb, counsel for the Debtor. The Motion has now been amended, as a result of the reopening of the Auction, and receipt by the Debtor of a cash bid in the substantially higher amount of \$9.1 Million. A request to approve the Motion as amended, has been filed today.

In the course of the past week, extensive negotiations were held between the undersigned and counsel for the Debtor, which would have resulted in our consent to entry of an Order granting the Motion and approving the Order authorizing the asset sale (the "Sale Order"). Just yesterday afternoon, however, the Debtor's counsel advised us that the putative purchaser would not consent to the negotiated resolution described above. Accordingly we must, with regret, advise the Court that Jpre does not consent to the Motion and intends to press its objection already on file with the Court. Indeed, we would request that the Court permit us to present, prior to Monday's hearing, an Order to Show Cause, with a Temporary Restraining Order, which, if granted, would defer the

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Court's consideration of the Motion pending either resolution of Jpre's entitlement to payment or, in the alternative, conditioning a closing of the Sale upon such resolution, whether by settlement or final decision of the Court.

We apologize for the fact that our papers cannot be presented before Monday; however, it seemed evident to us until yesterday afternoon that a working resolution had been achieved. More, of course, will be explained in our papers and at the upcoming hearing on Monday afternoon.

We thank the Court for its consideration in this matter.

Respectfully


Warren R. Graham

Cc: Schuyler Carroll, Esq. (via email)
Vadim Rubinstein, Esq. (via email)